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Clark County School District*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JOHN and JANE DOE I, Guardians Ad Litem  
for JOANN DOE I, a minor, individually and  
on behalf of all those similarly situated, and  
JOHN and JANE DOE II, Guardians Ad Litem  
for JOANN DOE II, a minor, individually and  
on behalf of all those similarly situated;

Plaintiffs,

vs.

JEREMIAH MAZO; CLARK COUNTY  
SCHOOL DISTRICT; DOES 1 through 20;  
DOE 1 through 20; ROE CORPORATIONS 1  
through 20;

Defendants.

Case No. 2:16-cv-00239-APG-PAL

**[PROPOSED] STIPULATION AND  
ORDER TO VACATE JUNE 19, 2018  
HEARING AND  
STAY CASE FOR 60 DAYS**

The parties are currently in settlement negotiations and have agreed to vacate the hearing scheduled for June 19, 2018 and delay the taking of the limited remaining depositions in this case to help facilitate settlement discussions and reserve resources. In light of this agreement, Plaintiffs, JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A MINOR AND JOHN AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A MINOR (collectively, "Plaintiffs"), Defendant CLARK COUNTY SCHOOL DISTRICT ("CCSD"), by and through their respective counsel of record, hereby jointly submit this proposed stipulation extending certain case

1 deadlines for the approval of the Court.

2 **STIPULATION**

3 The Parties hereby stipulate and agree to vacate the hearing regarding Plaintiffs' Motion for  
4 Protective Order (Doc. No. 78) currently scheduled for June 19, 2018 at 10:00 a.m.

5 It is further stipulated and agreed pursuant to Local Rule 6-1, that the case be stayed for a  
6 period of 60 days and the current discovery deadlines adjusted accordingly. The current deadlines  
7 are as follows:

8 Discovery Cut-Off Date: June 30, 2018

9 Dispositive Motions: July 30, 2018

10 Proposed Joint Pretrial Order: August 29, 2018 or 30 days after  
11 the Court rules on any  
12 dispositive motions.

13 **I. Background**

14 This case was filed on February 5, 2016, alleging abuse of students by a former CCSD  
15 teacher, Jeremiah Mazo, and bringing claims under Title IX against CCSD and state tort claims  
16 against all defendants. (Doc. 1). Plaintiffs filed a First Amended Class Action Complaint on March  
17 1, 2017. (Doc. 39). CCSD filed its Answer to the First Amended Class Action Complaint on March  
18 16, 2017, and asserted cross-claims against Defendant Mr. Mazo. (Doc. 43). Mr. Mazo filed an  
19 Answer to the Plaintiffs' First Amended Class Action Complaint on June 2, 2017 and his answer to  
20 CCSD's Cross-Claims on July 6, 2017 (Doc. Nos. 61, 67).

21 **II. Discovery Completed**

22 **Plaintiffs have served Defendant Clark County School District with the following**  
23 **discovery to date:**

- 24 1. Plaintiffs' Early Case Conference List of Documents and Witnesses Pursuant to  
25 FRCP 26(F) served 10/10/2016;
- 26 2. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and  
27 Jane Doe II, Guardians ad Litem for Joann Doe II's First set of Request of

Production of Documents served 10/27/16;

3. Plaintiffs' First Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 12/14/2016;

4. Plaintiff Jane Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

5. Plaintiff Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

6. Plaintiff John Doe I as Guardian ad Litem for Joann Doe I's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

7. Plaintiffs John and Jane Doe I as Guardians ad Litem for Joann Doe I's Responses to Clark County School District's First set of Request for Production of Documents served 12/14/2016;

8. Plaintiff Jane Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

9. Plaintiff Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

10. Plaintiff John Doe II as Guardian ad Litem for Joann Doe II's Responses to Clark County School District's First set of Interrogatories served 12/14/2016;

11. Plaintiffs John and Jane Doe II as Guardians ad Litem for Joann Doe II's Responses to Clark County School District's First set of Request for Production of Documents served 12/14/2016;

12. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's Second set of Requests for Production of Documents served 01/18/2017;

13. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Requests for Admission served 01/18/2017;

14. Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of

Interrogatories served 01/18/2017;

15. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Interrogatories served 01/18/2017;

16. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's First set of Requests for Admission served 01/18/2017;

17. Plaintiffs John and Jane Doe I, Guardians ad Litem for Joann Doe I, and John and Jane Doe II, Guardians ad Litem for Joann Doe II's Third set of Requests for Production of Documents served 01/20/2017;

18. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a minor's Second set of Interrogatories served 01/23/2017;

19. Plaintiffs' Second Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 02/10/17;

20. Plaintiff Joann Doe II's Supplemental Responses to CCSD's First set of Interrogatories served on 03/01/17;

21. Plaintiff Joann Doe I's Supplemental Responses to CCSD's First set of Interrogatories served on 03/01/17;

22. Plaintiffs' Third Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 05/31/17;

23. Plaintiffs' Fourth Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 07/07/17;

24. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Third Set of Interrogatories to CCSD served 07/11/17;

25. Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's Fourth Set of Interrogatories to CCSD served 08/22/17;

26. Plaintiffs' Fifth Supplement to Early Case Conference List of Documents and Witnesses Pursuant to FRCP 26(F) served 10/11/17;

27. Plaintiffs' Expert Designation Pursuant to FRCP 26(A)(2) served 10/13/17.

**Defendant Clark County School District has served Plaintiffs with the following discovery to date:**

1. CCSD's Initial Disclosures served 10/05/2016;
2. CCSD's First set of Interrogatories to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I served 11/14/2016;
3. CCSD's First set of Interrogatories to Plaintiff Joann Doe I served 11/14/2016;
4. CCSD's First set of Interrogatories to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I served 11/14/2016;
5. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane Doe I, as Guardians ad Litem for Joann Doe I served 11/14/2016;
6. CCSD's First set of Interrogatories to Plaintiff Jane Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
7. CCSD's First set of Interrogatories to Plaintiff Joann Doe II served 11/14/2016;
8. CCSD's First set of Interrogatories to Plaintiff John Doe II, as Guardian ad Litem for Joann Doe II served 11/14/2016;
9. CCSD's First set of Requests for Production of Documents to Plaintiffs John and Jane Doe II, as Guardians ad Litem for Joann Doe II served 11/14/2016;
10. CCSD's Responses to Plaintiffs' First set of Requests for Production of Documents to the Clark County School District served 12/01/2016;
11. CCSD's First Supplemental Disclosures served 12/01/2016;
12. CCSD's Second Supplemental Disclosures served 02/17/17;
13. CCSD's Third Supplemental Disclosures served 02/24/17;
14. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;
15. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a Minor's First Set of Requests for Admission to CCSD served 02/24/17;

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- 1 16. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 2 Minor's First set of Interrogatories to CCSD served 02/27/17;
- 3 17. CCSD's Responses to Plaintiff Jane Doe I, as Guardian ad Litem for Joann Doe I, a
- 4 Minor's First set of Interrogatories to CCSD served 02/27/17;
- 5 18. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 6 Minor's Second set of Interrogatories to CCSD served 03/10/17;
- 7 19. CCSD's Fourth Supplemental Disclosures Pursuant to FRCP 26(a)(1) and Pursuant
- 8 to March 6, 2017 Order served 04/05/17;
- 9 20. CCSD's Responses to Plaintiff John Doe I, as Guardian ad Litem for Joann Doe I, a
- 10 Minor's Third set of Interrogatories to CCSD served 07/24/17;
- 11 21. CCSD's Fourth Supplemental Disclosures served 08/21/17;
- 12 22. CCSD's Responses to Plaintiff Jon Doe I, as Guardian ad Litem for Joann Doe I, a
- 13 Minor's Fourth set of Interrogatories to CCSD served 09/21/17;
- 14 23. CCSD's Sixth Supplemental Disclosures served 09/01/2017;
- 15 24. CCSD's Seventh Supplemental Disclosures served 10/13/17;
- 16 25. CCSD's Expert Witness Disclosures served 10/13/17.

17 **The following depositions have been completed to date:**

- 18 1. Ulandra Barnett
- 19 2. Ivy Burns
- 20 3. Sylvia Glass
- 21 4. Jennifer Mattiello
- 22 5. Nestor Mattiello
- 23 6. Jon Okazaki
- 24 7. Julia Pettit
- 25 8. Kristopher Pettit
- 26 9. Christine Prosen
- 27 10. Darrin Puana

11. Billie Rayford

12. Joann Lippert

**III. Discovery That Remains to be Completed**

1. Depositions of Plaintiffs Joann Doe I and Joann Doe II;<sup>1</sup> and

2. Certain Expert Depositions<sup>2</sup>

**IV. Basis for Extension**

The parties request this stay and extension of discovery to allow the depositions of Joann Doe I, Joann Doe II (subject to Motion for Protective Order), and certain of the parties' expert witnesses to take place should settlement negotiations come to an impasse. The parties have diligently engaged in discovery and want to avoid incurring any additional expense at this time. Accordingly, the parties request a 60 day stay of this matter, request that the June 19, 2018 hearing be vacated and request an extension to allow for the foregoing outstanding discovery to be completed 60 days from the current deadlines as detailed below.

**V. Proposed Modification**

Based on the foregoing, the parties jointly seek a modification of the current deadlines as follows:

1. **Current Deadlines:**

**Discovery Cut-Off Date:**

**June 30, 2018**

**Dispositive Motions:**

**July 30, 2018**

**Proposed Joint Pretrial Order:**

**August 29, 2018 or 30 days  
after the Court rules on any  
dispositive motions.**

2. **Proposed Deadlines:**

**Discovery Cut-Off Date:**

**August 29, 2018**

**Dispositive Motions:**

**September 28, 2018**

**Proposed Joint Pretrial Order:**

**October 29, 2018 or 30 days**

<sup>1</sup> The ability for such deposition to go forward is the subject of Plaintiff's Motion for Protective Order (Doc. No. 78).

<sup>2</sup> Defendants have taken the deposition of Plaintiffs' expert Joann Lippert. The parties scheduled the depositions of experts Terrence Clauretie, Edward Dragan, Peter Loehr and Brett Sokolow for the latter part of June, but agree to continue such depositions to allow for settlement discussions.

after the Court rules on any  
dispositive motions.

3. This request is made in good faith and not for the purposes of delay.

**IT IS SO STIPULATED.**

Dated this 12th day of June, 2018.

Dated this 12th day of June 2018.

**GREENBERG TRAURIG, LLP**

**EGLET PRINCE**

/s/ Kara B. Hendricks

/s/ Artemus W. Ham

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**ORDER**

**IT IS HEREBY ORDERED.**

DATED this 13th day of June, 2018.

  
UNITED STATES MAGISTRATE JUDGE